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June 1, 2012

BY ECF FILING

Magistrate Judge Robert M. Levy
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: State Farm v. McGee, et al., 1:10-cv-03848-ILG-RML

Dear Judge Levy:

I am responding to the letter by Plaintiff State Farm's Attorneys dated June 1, 2012 to the Court.

Our firm at present is counsel for Alternative Program Queens Division, Inc., Executive Corp., Sion Marketing, Inc., and London Billing and Collections, Inc., Semen Ilyaich, Sofiya Babadzhanova a/k/a/ Sofiya Ilyaich, and Mikhail Ilyaich a/k/a Michael Ilyaich.

I received a letter from the Court which Plaintiff's Counsel filed with the Court sometime late today. I had attempted to contact counsel for the Plaintiff today to discuss the issues which they deem outstanding but I did not receive any communication from

them until approximately 4:45 p.m. today via e-mail at approximately the same time that I received their letter from the Court.

It has been noted by Plaintiff's counsel on more than one occasion to the Court that the Ilyaich Defendants have significantly complied with all discovery requests.

Plaintiff's counsel's letter states at paragraph number 1 that they have not received verifications for two of the Defendants original responses to interrogatories. We did send the responses on May 17, 2012. Plaintiff's counsel now states that the verifications are incorrect. We will correct the verifications if they are incorrect.

Plaintiff's counsel in their letter at paragraph numbered 2 requests information regarding account numbers for two of the Defendant entities. The Ilyaich Defendants do not have any other information. The Bank Branch was the only information they had and it was given to Plaintiff's counsel.

Plaintiff's counsel in the paragraph numbered 3 of their letter requests that the Ilyaich Defendants identify every individual or entity who has provided services to each of the PC Defendants. The Ilyaich Defendants provided such documents that they had in their possession. They don't have any other documents nor do have any more information to respond to this issue.

Plaintiff's counsel in the paragraph numbered 4 of their letter requests that the Ilyaich Defendants provide all employee or independent contractor information for the last 10 years or so. The Ilyaich Defendants have provided all of the documents that they have in their possession through their accountants. They don't have any more information.

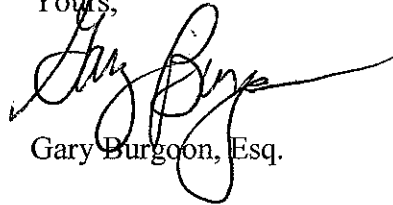
Plaintiff's counsel in the in the paragraph numbered 5 of their letter requests that the Ilyaich Defendants identify the persons or entities to whom they provided services. The only other Defendant entity that Ilyaich Defendants had any relationship with was Dr. McGee. The Ilyaich Defendants provided all documents that they had in their possession relating to this request.

Plaintiff's counsel in the in the paragraph numbered 6 of their letter requests that the Ilyaich Defendants provide any agreements between the management companies and/or True Owners and any doctor, clinic, professional corporation or provider of medical services. Again, the Ilyaich Defendants do not have any agreements in their possession.

The Ilyaich Defendants have complied to the best of their ability to the requests made by Plaintiff's Attorneys. They have not in any way ignored or disregarded the requests made to them by Plaintiff's Attorneys.

Although I respect Plaintiff's right to conduct discovery and represent their clients diligently, I don't know what else the Ilyaich Defendants can do at this time to appease them. I would therefore request that the Court consider in any decision relating to this present letter by Plaintiff's Attorneys that the Ilyaich Defendants have complied the best they can and that they are not in any way ignoring any order of the Court.

Yours,

A handwritten signature in black ink, appearing to read "Gary Burgoon", with a long, sweeping horizontal line extending to the right.

Gary Burgoon, Esq.